



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EN:GKS
F. #1998R01996

*271 Cadman Plaza East
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May 11, 2016

By Hand and ECF

The Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: In re Motion for Civil Contempt by John Doe
Miscellaneous Docket No. 12-557 (BMC)

Dear Judge Cogan:

The government respectfully submits this supplemental response to the Court's March 3, 2016 order to show cause. This letter reflects the government's views regarding the continued sealing of documents to which the government recently gained access.

In its April 25, 2016 submission, the government indicated that it was unable to access Docket Nos. 55, 56, 57, 58, 59, 97, 98, 104, 109, 122-11, 142, 145, 148 and 149. At the May 10, 2016 hearing, counsel for movant Felix Sater identified these documents on the record as inaccessible to the case participants. After the hearing, the government submitted a proposed limited unsealing order granting the case participants access to the above-referenced documents. Dkt. No. 179. The Court issued an order on May 11, 2016 that, in relevant part, directed the Clerk of Court to grant the government access to these documents.

The government has reviewed these documents applying the same analysis and categories outlined in its April 25, 2016 and May 3, 2016 submissions, which are

